



Oregon

Theodore Kulongoski, Governor

Department of Environmental Quality

Northwest Region Portland Office
2020 SW 4th Avenue, Suite 400
Portland, OR 97201-4987
(503) 229-5263
FAX (503) 229-6945
TTY (503) 229-5471

August 8, 2006

Christopher G. Barricklow, CHMM
Regulatory Compliance Supervisor
Flint Ink Corporation
4600 Arrowhead Drive
Ann Arbor, MI 48105

Re: Conditional No Further Action Determination
Flint Ink Corporation Site
10653 North Lombard Street
Portland, Oregon
ECSI #1753

Dear Chris:

The Oregon Department of Environmental Quality (DEQ) reviewed site investigation reports and other information regarding property located at 10653 North Lombard, which is leased by Flint Ink Corporation (Flint).

Flint entered into a letter agreement with DEQ on October 11, 2005 for review of historical information and oversight during field sampling to determine the extent of contamination resulting from a historical fire and subsequent fire fighting activities. The primary concerns at the site were impacts to the dry well system due to releases of petroleum-based ink during a December 1993 fire. During the most recent sampling event eight soil borings were advanced for collection of soil and groundwater samples. Based on the results of the investigation DEQ determined that the site was protective of human health and the environment and a no further action (NFA) determination was warranted. A summary of historical site information and the basis for DEQ's decision are included in the attached Staff Report.

The DEQ Staff Report identified the following conditions of the NFA:

- Registration of the dry wells with DEQ's Water Quality (WQ) Program
- In the event that slag and/or contaminated soil is to be disturbed and/or excavated, it is to be properly characterized and managed according to all applicable local, County, State and Federal regulations.

In a letter dated July 25, 2006 Flint submitted dry well registration forms to DEQ's WQ Program. The dry wells were adequately assessed during the DEQ Cleanup Program work and appear to be rule authorized and appropriate for permitting. Formal registration of the dry wells is pending by WQ. This NFA determination in no way affects WQ requirements that may apply to dry well registration.

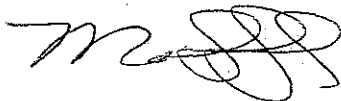
This NFA is conditional both upon WQ concurrence that the dry wells are rule authorized and can be permitted, and that potentially contaminated soil or slag is managed appropriately if disturbed as outlined above.

Based on our review of available site information, no further action is required at the site under the Oregon Environmental Cleanup law, ORS 465.200 *et. seq.*, unless additional information becomes available that warrants further investigation.

DEQ files and the Environmental Cleanup and Site Information (ECSI) database will be updated to reflect the conditional NFA determination upon complete payment of DEQ costs. I will initiate project closeout and you should receive the final invoice within about 8 weeks.

If you have any questions or comments about the information presented in this letter, please contact me at (503) 229-5587.

Sincerely,



Mark Pugh, R.G.
Project Manager
Cleanup and Emergency Response

Attachment: Staff Report

cc: Bruce Gilles, DEQ NWR C/ER (w/o att.)
Barbara Priest, DEQ UIC Program (w/o att.)
Sue MacMillan, URS (w/o att.)
Michael Zahn, Harsch Investments (w/o att.)